

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 15
GEDEN HOLDINGS, LTD.,	)	
	)	Case No. 25-90138 (ARP)
Debtor in a Foreign Proceeding.	)	
	)	
	)	

**ADVANTAGE AWARD SHIPPING LLC’S WITNESS AND EXHIBIT LIST**

Advantage Award Shipping, LLC (“**Advantage Award**”)<sup>1</sup> hereby submits the following *Witness and Exhibit List* (the “Witness and Exhibit List”) with respect to the hearing scheduled on June 4, 2025 at 11:00 a.m. (CT), in the above-captioned bankruptcy case (the “Case”), pending before the Honorable Alfredo R. Perez, United States Bankruptcy Judge, Courtroom 400, 515 Rusk, Houston, Texas 77002.

**WITNESS LIST**

Advantage Award may call the following witnesses:

1. Dr. Reuben Balzan, Liquidator of Geden Holdings, Ltd.
2. Any witness listed, offered, or called by any other party.
3. Any witness necessary for rebuttal.

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<sup>1</sup> Under Local Rule 9027-3, Advantage does not consent to entry of final orders or judgments by the bankruptcy judge. Advantage appears in this matter for the sole purpose of opposing recognition. By so appearing, Advantage: (a) does not submit to the jurisdiction of this Court or the U.S. District Court for the Southern District of Texas under one or more of 28 U.S.C. §§ 157, 1334, and 1452 (together, the “**Bankruptcy Court**”); (b) does not waive any argument that the Bankruptcy Court lacks jurisdiction over Advantage or any disputes between Advantage on the one hand and the Liquidator (as defined above) and any other party to this proceeding on the other hand; and (c) does not waive any argument regarding the referral of any matter from the United States District Court to the United States Bankruptcy Court, or any argument for or against removal, remand, or abstention.

**EXHIBIT LIST**

<b>Exhibit No.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted</b>	<b>Disposition After Hearing</b>
1.	Original Verified Complaint in <i>Eclipse Liquidity, Inc. v. Avor Navigation Ltd., et al.</i> , Case No. 4:15-cv-01645 (S.D. Tex.) {Exhibit 1 to Request for Judicial Notice [Docket No. 24] (the “ <b>RJN</b> ”)}				
2.	Original Verified Complaint in <i>Tank Punk, Inc. v. Spike Shipping Ltd.</i> , Case No. 4:15-cv-01675 (S.D. Tex.) {Exhibit 2 to RJN}				
3.	Original Verified Complaint in <i>Psara Energy, Ltd. v. Space Shipping, Ltd.</i> , Case No. 4:15-cv-01673 (S.D. Tex.) {Exhibit 3 to RJN}				
4.	S.D. Tex. Consolidation Order {Exhibit 4 to RJN}				
5.	Memorandum and Recommendation Granting Defendants’ Amended Motion to Vacate Attachments and Dismiss {Exhibit 5 to RJN}				
6.	Final Judgment dated November 23, 2016 {Exhibit 6 to RJN}				
7.	Original Verified Complaint filed in <i>Tank Punk, Inc. v. Spike Shipping Ltd.</i> , Case No. 1:15-cv-00461-MAC (“ <b>Tank II</b> ”) {Exhibit 7 to RJN}				
8.	Amended Order of Dismissal and Directing the Release of Security in Tank II {Exhibit 8 to RJN}				
9.	Original Verified Complaint in <i>Psara Energy, Ltd. v. Space Shipping, Ltd.</i> , Case No. 1:15-cv-00355 (E.D. Tex.) (“ <b>Psara II</b> ”) {Exhibit 9 to RJN}				
10.	Order of Dismissal in Psara II {Exhibit 10 to RJN}				
11.	Plaintiff’s Original Verified Complaint in <i>Psara Energy, Ltd. v. Space Shipping, Ltd.</i> , Case No. 2:16-cv-04840-WB (E.D. Pa.) (“ <b>Psara III</b> ”) {Exhibit 11 to RJN}				
12.	Order issued in Psara III on January 3, 2017 {Exhibit 12 to RJN}				
13.	Original Verified Complaint in <i>Psara Energy, Ltd. v. Space Shipping, Ltd.</i> , Case No. 2:16-cv-01305-SM-MBN (E.D. La.) (“ <b>Psara IV</b> ”) {Exhibit 13 to RJN}				
14.	Order issued in Psara IV on January 6, 2017 {Exhibit 14 to RJN}				

15.	Plaintiff's Original Verified Complaint in <i>Psara Energy, Ltd. v. Space Shipping, Ltd.</i> , Case No. 1:18-cv-00178 (E.D. Tex.) (" <b>Psara V</b> ") {Exhibit 15 to RJN}				
16.	Order of Dismissal in Psara V and Psara VI (as defined below) on February 10, 2021 {Exhibit 16 to RJN}				
17.	Original Verified Complaint in <i>Psara Energy, Ltd. v. Space Shipping, Ltd.</i> , Case No. 2:18-cv-04111 (" <b>Psara VI</b> ") {Exhibit 17 to RJN}				
18.	Order and Reasons {Exhibit 18 to RJN}				
19.	Plaintiff's Original Verified in <i>Psara Energy, Ltd. v. Space Shipping, Ltd.</i> , Case No. 3:20-cv-04102 (N.D. Cal.) (" <b>Psara VII</b> ") {Exhibit 19 to RJN}				
20.	Order Transferring Case {Exhibit 20 to RJN}				
21.	Order of Dismissal in Psara VII {Exhibit 21 to RJN}				
22.	Original Complaint in <i>Eclipse Liquidity, Inc. v. Geden Holdings Ltd. et al.</i> , No. 200300816 (" <b>Eclipse IIIa</b> ") {Exhibit 22 to RJN}				
23.	Answer and New Matter in Eclipse IIIa {Exhibit 23 to RJN}				
24.	Original Complaint in <i>Eclipse Liquidity, Inc. v. Karahmet-Williams et al.</i> , No. 230602605 (" <b>Eclipse IIIb</b> ") {Exhibit 24 to RJN}				
25.	Plaintiff's Sur Reply to Corporate Defendants' Reply Brief in Support of Their Preliminary Objections in Eclipse IIIb {Exhibit 25 to RJN}				
26.	Appeal Opinion issued on April 23, 2024 in Eclipse IIIa and Eclipse IIIb {Exhibit 26 to RJN}				
27.	Order in <i>Eclipse Liquidity, Inc. v. Geden Holdings Ltd. et al.</i> , No. 587 EDA 2024 (Penn. Sup. Ct.) (the " <b>PA Appeal</b> ") {Exhibit 27 to RJN}				
28.	Response of Reuben Balzan Liquidator of Geden Holdings Ltd. to Order to Show Cause in the PA Appeal {Exhibit 28 to RJN}				
29.	Declaration of Advocate Reuben Balzan {Exhibit 29 to RJN}				
30.	Order in the PA Appeal {Exhibit 30 to RJN}				
31.	Petition for Allowance to Appeal Order of the Superior Court filed with the Supreme Court of Pennsylvania on June 4, 2024 {Exhibit 31 to RJN}				

32.	Order of the Supreme Court of Pennsylvania {Exhibit 32 to RJN}				
33.	Petition of Reuben Balzan on Behalf of Petitioner Geden Holdings, Ltd. in Liquidation for the Court to Exercise Jurisdiction Under 42 PA. C.S. 726 {Exhibit 33 to RJN}				
34.	Order of the Supreme Court of Pennsylvania {Exhibit 34 to RJN}				
35.	October 9, 2024 Motion to Maltese Court <sup>2</sup>				
36.	Any exhibits listed, designated, or offered by any other party				
37.	Any exhibits necessary for rebuttal				
38.	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases and related adversary proceedings				

Advantage Award reserves the right to modify, amend or supplement this Witness and Exhibit List at any time. Advantage Award reserves the right to ask the Court to take judicial notice of pleadings, orders, transcripts and/or documents filed in or in connection with this Case, to offer rebuttal exhibits, and to supplement or amend this Witness and Exhibit List at any time prior to the June 4, 2025 hearing. Designation of any exhibit above does not waive any objections Advantage Award may have to any exhibit listed on any other party's exhibit list.

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<sup>2</sup> Advantage Award is in the process of obtaining a certified translation of this Exhibit.

Dated: June 2, 2025

Respectfully submitted,

**PACHULSKI STANG ZIEHL & JONES LLP**

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*Counsel for Advantage Award Shipping, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 2, 2025, a true and correct copy of the above and foregoing pleading was caused to be served electronically through this Court's CM/ECF noticing system on parties registered to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District, including the United States Trustee and counsel for the Foreign Representative.

/s/ Steven W. Golden  
Steven W. Golden